

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

R E C E I V E D

DEC 19 2016

JONATHAN DONNELL WILLIAMS  
(Enter the full name of the plaintiff in this action)

COMPLAINT

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH  
CLERK

v

A. JENKINS, Medical Security Officer  
ANN KLEIN FORENSIC CENTER

Civil Action No. \_\_\_\_\_  
(To be supplied by the Clerk of the Court)

\_\_\_\_\_  
(Enter the full name of the defendant in this action)

INSTRUCTIONS; READ CAREFULLY

1. This complaint must be legibly hand written or typewritten, signed by the plaintiff and subscribed to under penalty of perjury as being true and correct. All questions must be answered concisely in the proper space on the form. Where more space is needed to answer any question, attach a separate sheet.
2. In accordance with Rule 8 of the Federal Rules of Civil Procedure the complaint should contain (1) a short and plain statement of the grounds upon which the court's jurisdiction's depends, (2) a short plain statement of the claim showing that you are entitle to relief, and (3) a demand for judgment for the relief which you seek.
3. You must provide the full name of each defendant or defendants and where they can be found.
4. You must send the original and one copy of the complaint to the Clerk of the District Court. You must also send one additional copy of the complaint for each defendant to the Clerk. Do not send the complaint directly to the defendants.
5. Upon receipt of the fee of \$400.00 (a filing fee of \$300.00 and an administrative fee of \$50.00), your complaint will be filed. You will be responsible for service of a separate summons and copy of the complaint on each defendant. See Rule 4, Federal Rule of Civil Procedure.

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6. If you cannot prepay the \$400.00 fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth in the application to proceed in forma pauperis. See 28 U.S.C §1915. If there is more than one Plaintiff, each plaintiff must separately request the permission to proceed in forma pauperis.)
7. If you are given permission to proceed in forma pauperis, the \$50.00 Administrative Fee will not be assessed. The Clerk will prepare and issue a copy of the summons for each defendant. The copies of the summonses and the copies of the complaint which you have submitted will be forwarded by the Clerk to the United States Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can date and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

**QUESTIONS TO BE ANSWERED**

- 1a. Jurisdiction is asserted pursuant to (CHECK ONE)

☒ 42 U.S.C. §1983 ( applies to state prisoners)

☐ Bivens v. Six Unknown Named Agents of Fed. Bureau of  
Narcotics, 403 U.S. 388 (1971) and 28 U.S.C. § 1331  
(applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below;

\_\_\_\_\_

- 1b. Indicate whether you are a prisoner or other confined person as follows;

☒ Pretrial detainee

☒ Civilly-committed detainee

☐ Immigration detainee

☐ Convicted and sentenced state prisoner

☐ Convicted and sentenced federal prisoner

☐ Other (please explain) \_\_\_\_\_

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2. Previously Dismissed Federal Civil Actions or Appeals

a. Parties to previous lawsuit:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

b. Court and docket number: \_\_\_\_\_

c. Grounds for dismissal: ( ) frivolous ( ) malicious

( ) failure to state a claim upon which relief  
may be granted

d. Approximate date of filing lawsuit: \_\_\_\_\_

e. Approximate date of disposition: \_\_\_\_\_

If there is more than one civil action or appeal, describe additional civil actions or appeals using this same format on separate sheets.

3. Place of present Confinement? Mercer County Correctional Center

4. Parties

(In item (a) below, place your name in the first blank and place your present address in the second blank. Do the same for additional Plaintiffs, if any.)

a. Name of plaintiff: Jonathan Donnell Williams

Address: \_\_\_\_\_

Inmate #: # 549041

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b. First defendant:

Name: A. JENKINS

Official position: Medical Security Officer

Place of employment: ANN KLEIN FORENSIC CENTER

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

Violated my constitutional rights under the Federal and State Constitution and New Jersey Statutes

c. Second defendant:

Name: \_\_\_\_\_

Official position: \_\_\_\_\_

Place of employment: \_\_\_\_\_

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

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d. If there are more than two defendants, attach a separate sheet. For each defendant specify: (1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

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5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

☐ Yes ☒ No

- a. If your answer is "Yes", briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

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- b. If your answer is "No", briefly explain why administrative remedies were not exhausted. Due to plaintiff's hand injury and the continued pain, it was futile to attempt to file a grievance on his own. Plaintiff's multiple requests (by word of mouth) for staff assistance to help write out a grievance was to no avail and fell upon death ears.

6. Statement of Claims

(State here as briefly as possible the facts of your case. Describe how each defendant violated your rights, giving dates and places. If you do not specify how each defendant violated your rights and the date(s) and place of the violations, your complaint may be dismissed. Include also the names of other persons who are involved, including dates and places. Do not give any legal arguments or cite and cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach a separate sheet if necessary.)

COMPLAINT

Plaintiff, Jonathan Donnell Williams, complains against defendant(s) as follows:

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NATURE OF THE ACTION

1. This is a civil action for compensatory, punitive, and treble damages for harm caused to the plaintiff whom under color of state law, have:

2. The injuries alleged in the underlying lawsuit occurred on January 16, 2016, while a pretrial detainee at Ann Klein Forensic Center, Stuyvesant Avenue, West Trenton, New Jersey 08628.

3. Venue is proper in the United States District Court, because the acts and transactions complained of herein all occurred in this District and the defendant(s) work's in this district.

4. That each and every act alleged herein was done by the defendant(s), not only as an individual(s), but under the color and pretense of the statutes, ordinances, regulations, customs and usages of the State of New Jersey, and the rules, policies and direction of Ann Klein Forensic Center

5. The actions of the defendant(s) impeded and hindered the course of justice with intent to deny plaintiff the due process of law and equal protection.

6. The defendant(s) have engaged in conspiratorial conduct by ignoring the plaintiff and other similarly situated, the defendant(s) deliberate acts violated the trust - entrusted to his care by Ann Klein Forensic Center (A.K.F.C.)

7. Relief (State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

Plaintiff prays:



6. Statement of Claims

7. Plaintiff asserts that at no time did he become combative, hostile, unruly, threatening, or showed any aggression whatsoever towards defendant.

8. Plaintiff asserts that defendant's actions were without warning or provocation on plaintiff's part.

9. Plaintiff asserts that defendant was aggressive and threatened plaintiff with physical violence and death prior to the alleged assault.

10. Plaintiff asserts that at no time was I ordered to remain in his cell by defendant or staff.

11. Plaintiff asserts that while he was in his cell attempting to exit, I had placed my right hand at the outer rim of the cell door.

12. Plaintiff asserts that defendant with both hands intentionally slammed the door shut severing (amputating) plaintiff's right pink finger.

13. Plaintiff asserts that he suffered (suffer's) severe emotional and physical pain.

14. Plaintiff suffered a severe bodily injury.

6. Statement of Claims

15. Plaintiff asserts that the defendant Made direct eye contact with plaintiff and intentionally and purposely slammed the cell door without NO regard to plaintiff's hand being in the door frame.

16. Plaintiff asserts that defendant was not acting like or performing duties as a security Medical Officer when he purposely slammed the cell door shut into plaintiff's finger severing it.

17. Plaintiff asserts that defendant Maliciously and sadistically with total disregard to plaintiff's safety slammed the cell door shut severing plaintiff's pinky finger causing plaintiff a severe injury and extreme pain.

18. Plaintiff asserts that as a direct result of defendant's action, plaintiff suffered a amputated finger.

19. Plaintiff asserts that he received immediate Medical treatment and was transferred to Helen Fuld Medical Center

20. Plaintiff asserts that he was later transferred to another hospital where efforts to reattach his finger were unsuccessful.



6. Statement of Claims

21. Plaintiff asserts that as a direct result of losing his finger, plaintiff suffers daily fear, anxiety, loss of sleep, appetite and Nightly Nightmares.

22. Plaintiff has no plain, adequate, or complete remedy at law to redress the wrongs alleged herein.

23. Plaintiff has brought this action against the defendant "individually and as a whole person, and in his official and unofficial capacity."

24. Plaintiff has been inflicted with emotional distress by vexation during interminable periods of waiting for some official action.

25. Plaintiff declares that defendant's action violated Plaintiff's rights guaranteed by the United States Constitution.

Plaintiff declares under penalty of perjury that the aforesaid is true and correct.

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A. Plaintiff is seeking a declaratory judgment declaring that the defendant action of use of excessive force against plaintiff violated his Civil rights under the Federal and State Constitution and the Criminal laws of the State of New Jersey.

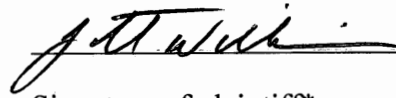
B. Plaintiff is seeking a declaratory judgment against defendant that by slamming the cell door into Plaintiff's

8. Do you request a jury or non-jury trial? (Check only one)

☐ Jury Trial ☐ Non-Jury Trial

I declare under penalty of perjury that the foregoing is true and correct

Signed this 13 day of December, 20 16

  
Signature of plaintiff\*

(\* EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF. REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT).

7. Relief

Finger, he violated plaintiff's Civil rights under the Federal and State Constitution and the Criminal laws of the State of New Jersey.

C. Punitive damages of \$1,000,000.00 against defendant.

D. Declaratory damage of \$1,000,000.00 against defendant.

E. Compensatory damages \$1,000,000.00 against defendant

F. Consequential damages of \$1,000,000.00 against defendant

G. For Pre-judgment interest, as well as the plaintiff's reasonable attorney fees, expert witnesses fees and other cost of action as a indigent.

H. For additional punitive damages in an amount that will sufficiently punish the defendant for his conduct and that will serve as an example to prevent such conduct by other Medical security officers in the future.

I. For appointment of pro bono counsel.

## 7. Relief

J. Plaintiff demands a jury trial.

K. For permanent injunctive relief sufficient to abate the harms caused by the defendant, including but not limited to:

1. Mental health counseling and treatment

2. Future Medical bills and expenses.

L. Such other and further extraordinary equitable or other relief as permitted by law as necessary to assure that plaintiff has an effective remedy.

M. For any other relief that the Court deems just and proper, to which the plaintiff is entitled.

Jonathan Donnell Williams # 549041  
Mercer County Correctional Center  
P.O. Box 8068  
Trenton, New Jersey 08650

United States District Court  
Office of the Clerk  
402 East State Street  
Trenton, New Jersey 08608

